

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X

ELIZABETH MANON,

**13 CV 3476 (RJS)**

Plaintiff,

**NOTICE OF MOTION**

- against -

878 EDUCATION, LLC, ALFONSO GARCIA,  
*Individually*, and ALEX OLINER, *Individually*,

Defendants.

-----X

**PLEASE TAKE NOTICE** that upon the annexed memorandum of law, the undersigned on behalf of Plaintiff will move this Court at the United States Courthouse located at 40 Foley Square, New York, NY as soon as counsel can be heard, for an Order pursuant to FRCP 37(c)(1) precluding evidence relating to Plaintiff's criminal conviction, unemployment benefits records, and further relief the Court deems necessary and proper.

Dated: New York, New York  
April 13, 2015

**Phillips & Associates, PLLC**



Alex Umansky (AU7961)  
Casey Wolnowski (CW9371)  
*Attorney for Plaintiff*  
45 Broadway, Suite 620  
New York, NY 10006  
(212) 248-7431  
[aumansky@tpglaws.com](mailto:aumansky@tpglaws.com)  
[cwolnowski@tpglaws.com](mailto:cwolnowski@tpglaws.com)